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July 30, 2025

VIA ECF

Honorable Valerie Figueredo
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *Cavara et al. v. The Bolivarian Republic of Venezuela*
Civil Case No. 25-cv-00165-RA-VF

Your Honor:

We represent Plaintiffs in the above-captioned matter. With the consent of defendant The Bolivarian Republic of Venezuela (the "Republic"), we respectfully write pursuant to Rule 1(e) of your Honor's Individual Practices to request a one-month extension of the parties' respective upcoming deadlines: (1) the August 1, 2025 deadline for Plaintiff to file any Amended Complaint; and (2) the August 15, 2025 deadline for Defendant to respond to the Complaint (D.E. 17). This is the parties' second request for an extension of these deadlines, and there are no upcoming deadlines or appearances before the Court.

As a reminder, the Court previously extended the deadline to allow the parties to continue discussions regarding a possible amendment of the Complaint by consent, pursuant to Fed. R. Civ. P. 15(a)(2), with the goal of streamlining issues for the Court's consideration. This request is made due to the summer vacation schedules of certain counsel and clients on Plaintiff's side during the current period, as well as the parties' mutual interest in further discussing the scope of any proposed amendment.

We therefore respectfully request that Plaintiff's deadline to file any Amended Complaint be extended until September 2, 2025, and Defendant's deadline to respond to the Complaint be extended until September 16, 2025.

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MEMO ENDORSED


HON. VALERIE FIGUEREDO
UNITED STATES MAGISTRATE JUDGE

Dated: 7/31/2025

The extensions requested herein are GRANTED.

The Clerk of Court is respectfully directed to terminate the gavel at ECF No. 18.

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We thank the Court for its consideration of this request.

Respectfully submitted,

/s/ Rudolph J. Di Massa, Jr.

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